



SIMPLOT PHOSPHATES LLC
(435) 789-7795

9401 NORTH HWY. 191

VERNAL, UTAH 84078

Cert.
RECEIVED

FEB 19 2009

**UTAH DIVISION OF
SOLID & HAZARDOUS WASTE**
2009.00615

February 19, 2009

Dennis R. Downs, Director
Division of Solid and Hazardous Waste
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Subject: Submission of Simplot Phosphates' Solid Waste Landfill Annual Report

Dear Mr. Downs:

Enclosed, please find Simplot Phosphate's Solid Waste Landfill Annual Report for this past year. Also attached with the report is:

1. Financial Assurance Report and Reclamation Calculations.
2. Life of Landfill Calculations.
3. Training Report with training sign in sheet.

Our landfill has been inactive all year except for one day this past year which was April 12, 2008. After this emergency situation, we covered the industrial waste in the landfill and placed it back into inactive status. Our landfill is now currently inactive. It is our intent and our desire to maintain our permit for our class IIIb landfill, but keep it inactive and preserve it for future use. We again covered the industrial waste and re-educated to workers as to the landfill procedures and status.

If you have any questions or concerns feel free to contact me at (435) 781-3348

Sincerely,

John Spencer
Environmental / Senior Mining Engineer
Simplot Phosphates LLC

SOLID WASTE LANDFILL ANNUAL REPORT

For Calendar year 2008

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Administrative Information (Please enter all the information requested below - type or print legibly) **FEB 19 2009**

Facility Name: Simplot Phosphates LLC
Facility Mailing Address: 9401 North Highway 191
(Number & Street, Box and/or Route)
City: Vernal Zip Code: 84078
County: Uintah Permit No.: 9908

UTAH DIVISION OF
SOLID & HAZARDOUS WASTE
2009.00615

Owner

Name: Simplot Phosphates LLC Phone No.: (435) 789-7795
Mailing Address: 9401 North Highway 191
(Number & Street, Box and/or Route)
City: Vernal State: Utah Zip Code: 84078
Contact's Name: John Spencer Title: Environmental / Sr. Mine Eng.
Contact's Mailing Address: (Same as above)
Phone No.: (435) 781-3348 Contact's Email Address: John.Spencer@Simplot.com

Operator (Complete this section only if the operator is not an employee of the Owner shown above)

Name: _____ Phone No.: () _____
Mailing Address: _____
(Number & Street, Box and/or Route)
City: _____ State: _____ Zip Code: _____
Contact's Name: _____ Title: _____
Contact's Mailing Address: _____
Phone No.: () _____ Contact's Email Address: _____

Facility Type and Status

☐ Class I ☒ Class IIIb ☐ Class V
☐ Class II ☐ Class IVa ☐ Class VI
☐ Class IIIa ☐ Class IVb

Facility operates separate cells for C/D and municipal waste. Yes ☐ No ☒

If facility was permanently closed during the year enter date closed: _____

Annual Disposal

Waste Type	Total tons received at facility for disposal:		Total	Measurement	
	In-State	Out-of-State		Tons	Cubic Yards
Municipal	_____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
Industrial	<u>162.5</u>	<u>0</u>	<u>162.5</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C/D ¹	_____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>

¹C/D waste includes all waste going to a Class IV or VI landfill cell

Conversion Factor Used

☒ None Used ☐ From rules ☐ List Site Specific Conversion: _____

Recycling

Material Recycled: 0 Tons ☐ Cubic Yds. ☐
(Material recycled should not be included in disposed tons reported. Report compost on separate form. Circle tons or yards)

Utah Disposal Fee

Disposal Fee Required to be Paid to State Yes ☐ No ☒

Fee Paid Municipal \$ _____ C/D \$ _____
 Industrial \$ _____ Annual \$ _____

(Municipal, Industrial and C/D are fees paid by Commercial Facilities. Annual fee is paid by facilities operated by a municipality)

Landfill Capacity

Current Landfill Remaining Capacity

Tons: 4,959.0
Years: 6.8

Cubic Yards: 14,168.5
Acres: 7.5

Acres Currently Open: 0 Acres Currently Closed: 7.5

Financial Assurance

Current Closure Cost Estimate: \$32,391.00

Current Post-Closure Cost Estimate: \$30,464.00

Current Amount or Balance in Mechanism: \$92,947.00

(If facility permit has been renewed if balance does not equal or exceed total for closure and post-closure care please contact the Division)

Current Financial Assurance Mechanism: Bond #023-007-105

(ie. Bond, Trust Fund, Corporate or government Test etc.)

Mechanism Holder and Account Number: Liberty Mutual Insurance Company

(ie. Name of Bond Company, Bank etc. Account number)

Financial Assurance: Each facility must recalculate the cost of closure and post-closure care to account for inflation and design changes each year. The inflation factor can be found on the Division web page. Facilities that are using a trust account should include a copy of the most recent account statement.

Note Facilities using "Local Government Financial Test" or the "Corporate Financial Test" must provide the information required in R315-309-8(4) or R315-309-9(3) each year.

Other Required Reports

Ground Water Monitoring: Class I and V landfills only. Check if exempt ☒

Explosive Gas Monitoring: Class I, II and V landfills only. Check if exempt ☒

Training Report: A report of all training programs or procedures completed by facility personnel during the year.

Signature: Mark A. Krall

Date: 2/19/09

Signature should be by an executive officer, general partner, proprietor, elected official, or a duly authorized representative. A duly authorized representative must meet the requirements of the solid waste rules (UAC R315-310-2(4)(d)).

Print name: Mark A. Krall Title: Mine Manager

2008 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

General Information & Status of Landfill

Simplot's landfill was permitted in 2007 and the proper financial assurance put in place. For all of 2008 our landfill was cleaned up and covered and has been kept inactive except for one emergency occurrence on April 12th when we had an electrical control building roof collapse and the emergency repairs to get plant back up and running generated waste faster then it could be disposed of by a third party. The industrial waste material was covered and the status of the landfill was returned to inactive.

Simplot Phosphates LLC intends to keep the landfill inactive and reserve it for future use. Currently all of our industrial waste is hauled off site by a private contractor for disposal at the Uintah County landfill.

2008 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

Financial Assurance

For this past year our landfill has been kept inactive A Surety Bond (attached) is in place with the Utah DEQ Division of Solid and Hazardous Waste (DSHW) for \$92,947 with a stand by trust as the financial mechanism for final reclamation of this landfill. This amount is based on the final reclamation of the landfill at the end of its useful life, which at our peak usage (year 2005) is approximately 7 years life. Currently the landfill is inactive and reserved for future use so the actual life of the landfill may be 15 plus years from now. When the landfill is completed, there will be 7.5 acres of disturbance that will require reclamation. The bond with DSHW is based on this projected disturbance of 7.5 acres.

Based on the current disturbance figure, current reclamation costs for the landfill have been calculated. Attached are the annual calculations for current reclamation costs for the landfill. See the attached file titled "2008 Estimated for the cost of Closure and Post-Closure care".

2008 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

Training Report

Simplot's Landfill was currently inactive for all of 2008, except for one occurrence on April 12th when we had an electrical control building roof collapse and the emergency repairs to get plant back up and running generated waste faster than it could be disposed of by a third party. The waste placed in the landfill was immediately covered and the placed back in the inactive status. Other than this single occurrence our landfill was inactive.

The following is a narrative of the training programs and procedures for our site. Procedures for both operation and record keeping for the landfill have been written and implemented at this site. All employees that are involved with the landfill have been trained on these procedures and the operating plan is posted at key locations throughout the site. Every couple of years during MSHA Annual Refresher training (usually conducted in January), time is reserved to review landfill compliance. This includes reviewing with all the Simplot employees the approved waste that may be disposed of in the landfill, dumping procedures, record keeping procedures and inspection requirements along with other environmental compliance issues. In addition, this year we were able to provide additional training in May to our personnel, this training was 1 hour and included Landfill procedures and other related regulations, see attached sign in sheets.

As a quality control measure there are numerous inspections of the landfill by qualified environmental personnel. Inspections start with weekly dumpster inspections performed by the environmental department. This inspection consists of examining each dumpster for its contents. If something is found in the dumpster that is not approved to be disposed of in the landfill, it is removed and personnel in that location are re-instructed or re-trained on approved waste and proper disposal of the material.

Monthly Landfill Cover Reports are also filled out. These reports are completed by the mine foreman and identify the amount of dirt used in the capping of the landfill. This report includes: visually inspecting the condition of the dump, verifying the number of loads of waste disposed of in the dump, verifying that the material in the dump has been covered and visually inspecting for non approved waste in the landfill.

Quarterly inspections of the landfill area are also performed. These inspections are also performed by qualified environmental personnel. These inspections include: visually inspecting the landfill for overall condition, checking for prohibited materials (hazardous waste, liquids, excessive organics / food wastes), condition of drainage control systems, presences of disease vectors, and any corrective actions that are needed.

Landfill Volumes for 2008

Container	Month												Total Loads	Total Volume (Yds ³)
	January	February	March	April	May	June	July	August	September	October	November	December		
A	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B	-	-	-	-	-	-	-	-	-	-	-	-	-	-
C	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mine Trash Truck	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Standard PU	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Haul Truck	-	-	-	2.50	-	-	-	-	-	-	-	-	2.50	162.50
Total	-	-	-	2.50	-	-	-	-	-	-	-	-	2.50	162.50

Solid Waste Container Volumes

	Volume (yds ³)
A	2.2
B	2.5
C	3.2
Mine Trash Truck	14.0
Standard PU	2.3
Haul Truck	65.0

WASTE VOLUME RECORD FORM

An entry should be made for each waste container emptied into the landfill. Entries should include container letter or type (dumpsters have container letters stenciled on them) and portion of container emptied. (ex. half full, quarter full, etc.)

Container Letters or Types

A

B

C

Mine Trash Truck

Standard Pick-up Bed or Flat Bed

[illegible]

2008 Estimate for the cost of Closure and Post-Closure care

Task Description	Equipment	Units	Units	Hours		2004 RSMMeans				Average	2008		Total \$	Notes
				Factor ¹	Hours	Base Rate (\$)	Travel Rate (\$)	Base Rate (\$/hr)	Crew		\$	\$/hr		
Mobilization	Dozer D8R	Equip				292.0	1,022.00			0.02121	1,108.7		\$1,109	Dozer D8R
Mobilization	Dozer D4 or Tractor	Equip				204.0	714.00			0.02121	774.6		\$775	Dozer D4 or Tractor
Mobilization	Scraper 637E	Equip				350.0	1,225.00			0.02121	1,328.9		\$1,329	Scraper 637E
Project Manager					30.0			60.00		0.02121		65.1	\$1,953	
Contouring	D8R	C.Y.	7,623	0.011	83.9			148.04	B-10M	0.02121		160.6	\$13,467	120 ft push, 1.5 ft depth
Topsoil spreading	637E	C.Y.	2,541	0.012	30.5			249.86	B-33E	0.02121		271.1	\$8,265	1,500 ft haul, 0.5 ft depth
Seeding	Dozer D4 or Tractor	MSF	137	0.154	21.1			71.56	B-66	0.02121		77.6	\$1,640	Dozer D4 or Tractor
Seed Mix		Acres	3.2							0.02121	641.8		\$642	
De-Mobilization	Dozer D8R	Equip				292.0	1,022.00			0.02121	1,108.7		\$1,109	Dozer D8R
De-Mobilization	Dozer D4 or Tractor	Equip				204.0	714.00			0.02121	774.6		\$775	Dozer D4 or Tractor
De-Mobilization	Scraper 637E	Equip				350.0	1,225.00			0.02121	1,328.9		\$1,329	Scraper 637E
DSHW Inspections		Per Yr	2			300.0					18,000.0		\$18,000	30- yr post closure period
Maintenance post closure		each	3			2,250.0					6,750.0		\$6,750	3 times during post closure
Contingency (Administrative & Engineering) %			10										\$5,714	10 units at Maximum size
Total													\$62,855	

\$/ Acre 8,381
In-House \$/ Acre 2,036

Assumptions / Factors & Notes

1 - RSMMeans 2004

7.50 Total Final Landfill Acres

Total Final Landfill Acres

3.15 Current Disturbed Acres

Current Closure Cost Estimate	\$32,391
Current Post-Closure Cost Estimate	\$30,464

Mobilization

- Assume Equipment and Contractor will come out of Provo/Orem, Rock Springs, or SLC Areas. Based on 25 miles, add 10% for every additional 5 mi
Base Rate includes the equipment Operator, Laborer, Equipment owning & operating costs, This is the total hourly cost including the contractors overhead and profit.

Annual Inflation = Average Annual Inflation

Cat D8R = 310 HP and the average push to cover and contour the landfill is estimated at 120 ft - Moving Common Earth fill = \$3.81/ c.y.

Cat 637E Scraper > 21 yds, Common Earth 3,000 ft haul = \$3.40 / cy

MSF = Thousand Square Feet

Current Cost for the final reclamation seed mix is \$7.33 / pls (pound of live seed). In the past it has been as high as \$9.00/pls. For Estimation we will use \$8.15/pls

Our current Final Reclamation Seed mix is applied at a rate of 25.0 lbs/acre.

Simplot's Landfill

Year	Volume (yd ³)			Tons		Tons/BCY	Reclamation Costs
	Annual	Cummulative	Remaining	Annual	Day		
			25,955.6				
1999	911.6	911.6	25,044.0	227.9	0.62	0.25	
2000	1,415.0	2,326.6	23,629.0	495.3	1.36	0.35	
2001	1,529.0	3,855.6	22,100.0	535.2	1.47	0.35	
2002	1,323.6	5,179.2	20,776.4	463.3	1.27	0.35	
2003	1,810.0	6,989.2	18,966.4	633.5	1.74	0.35	
2004	1,887.6	8,876.7	17,078.9	660.6	1.81	0.35	
2005	2,070.4	10,947.1	15,008.5	724.6	1.99	0.35	
2006	675.2	11,622.3	14,333.3	236.3	0.65	0.35	
2007	2.3	11,624.6	14,331.0	0.8	0.00	0.35	
2008	162.5	11,787.1	14,168.5	56.9	0.16		
2009	-	11,787.1	14,168.5	-	-		
2010	-	11,787.1	14,168.5	-	-		
2011		11,787.1	14,168.5	-	-		
2012		11,787.1	14,168.5	-	-		
2013		11,787.1	14,168.5	-	-		
2014		11,787.1	14,168.5	-	-		
2015		11,787.1	14,168.5	-	-		
2016		11,787.1	14,168.5	-	-		
2017		11,787.1	14,168.5	-	-		

Current Remaining Landfill Capacity

Tons	4,959.0
Cubic Yards	14,168.5
Years	6.8 (At 2005 rates)
Acres	7.5

Sign In Sheet
Simplot Phosphates, LLC
~~Lowell~~ Storm Water SPCC & Hazardous Waste Training
Vernal, UT

Date: May 20, 2008

Time: 9 am - 10 am

PLEASE PRINT YOUR NAME

and

PLEASE SIGN YOUR NAME

- 1 Dennis Glines
- 2 Joseph P. Maguire
- 3 Delcie Gale
- 4 Wade Rushton
- 5 Verlyn Cook
- 6 Dennis Horrocks
- 7 Jim Pedersen
- 8 Rollin Roberts
- 9 Leroy Worthen
- 10 Mark Kraus
- 11 Mark Kremin
- 12 Wayne Jenkins
- 13 Nolan Jackson
- 14 Troy Haeue
- 15 Mike Dunker
- 16 David Wallace
- 17 JACK Jensen
- 18 KEN YENNIK
- 19 KEN LONG
- 20 RANDY AVERILL
- 21 DAVE TOPICH
- 22 Sharon Wilkins
- 23 SHAWNA WEAVER

- Dennis Glines
- Joseph P. Maguire
- Delcie Gale
- Wade Rushton
- Verlyn Cook
- Dennis Horrocks
- Jim Pedersen
- Rollin Roberts
- Leroy Worthen
- Mark A. Kraus
- Mark Kremin
- Wayne Jenkins
- Nolan Jackson
- Troy Haeue
- Mike Dunker
- David Wallace
- JACK Jensen
- KEN YENNIK
- KEN LONG
- RANDY AVERILL
- DAVE TOPICH
- Sharon Wilkins
- Shawna Weaver

24 _____

25 _____

DATE May 29th 2008 TIME 12:45pm
SUBJECT Landfill, SPCC, Hazardous Waste
MEETING LENGTH 1 hr HOURS
CONDUCTED BY John Spencer

TIME 12:45 PM

SUBJECT Landfill, SPCC, Hazardous Waste

MEETING LENGTH 1 1 hr

HOURS

CONDUCTED BY John Spencer

[illegible]

**SAFETY MEETING/TRAINING REPORT
OFFICE WAREHOUSE**

DATE May 29th 2008 TIME 12:45 pm
SUBJECT Landfill, Spill, Hazardous Waste

MEETING LENGTH 1 hr HOURS
CONDUCTED BY John Spencer
NAME SIGNATURE

Glines, Dennis	
Harrison, Bernadette	<i>Bernadette Harrison</i>
Harvey, Bruce	
Hartle, Troy	<i>Troy Hartle</i>
Iverson, John	<i>John Iverson</i>
Krall, Mark	
Senti, Jenny	<i>Jenny Senti</i>
Shue, Mary	<i>Mary Shue</i>
Slaugh, Carlene	<i>Carlene Slaugh</i>
Walker, Lana	<i>Lana Walker</i>
Weaver, Shawna	
Webb, Lisa	<i>Lisa Webb</i>
Wilding, Wade	<i>Wade Wilding</i>
Wilkins, Sharon	
Young, Bert	<i>Bert Young</i>

**SAFETY MEETING/TRAINING REPORT
MINE MAINTENANCE**

DATE May 29th 2008 TIME 12:45 pm
 SUBJECT Landfill, SPCC, Hazardous Waste
 MEETING LENGTH 1 hr HOURS
 CONDUCTED BY John Spencer
 NAME SIGNATURE

Brewer, Aron	
Cook, Verlyn	<i>Verlyn Cook</i>
Corbett, Chris	<i>Chris Corbett</i>
Deegan, Richard	
Gale, Delrie	
Harrison, Kirk	<i>Kirk Harrison</i>
Huber, Jim	<i>Jim H.</i>
Jackson, Justus	
Kidd, Leon	
Kidd, Shane	
Miller, Eric	
McCarrel, Craig	
Oaks, Dave	
Rushton, Wade	
Silcox, Lynn	<i>Lynn Silcox</i>
Slaugh, Layson	
Smuin, Brad	
Stagg, Clint	
Thunehorst, John	
Wilson, Tom	

Kiel Degorme

Kiel Degorme